

**EXHIBIT 30**

**Frontier Interrogatory Answers relating to access to Plaintiffs' PNR**

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*Attorneys for Defendant FRONTIER AIRLINES, INC.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

PETER DELVECCHIA, individually and as next friend of A.D., a Minor,	)	Case No.: 2:19-cv-01322-KJD-DJA
	)	
<i>Plaintiffs,</i>	)	<b>FRONTIER AIRLINES, INC.’S</b>
	)	<b>SUPPLEMENTAL ANSWERS</b>
v.	)	<b>TO PLAINTIFF A.D.’S THIRD</b>
	)	<b>INTERROGATORIES</b>
FRONTIER AIRLINES, INC., et al.,	)	
	)	
<i>Defendants.</i>	)	

**DEFENDANT FRONTIER AIRLINES, INC.’S SUPPLEMENTAL  
ANSWERS TO PLAINTIFF A.D.’S THIRD INTERROGATORIES**

Defendant FRONTIER AIRLINES, INC. (“Frontier”), by its undersigned attorneys, provides the following Supplemental Answers to Plaintiff A.D.’s Third Interrogatories.

1. Please state the total number of persons who were in possession of working (*i.e.*, not disabled) Login Credentials for the Navitaire Reservations System as of March 28, 2019.

**ANSWER:** 2,281.


2. Please state the total number of persons to whom Frontier issued Login Credentials for the Navitaire Reservations System for the first time, or who were permitted by Frontier to create their own Login Credentials for the Navitaire Reservations System for the first time, on any date after March 28, 2019, up to the present time.

**ANSWER:** 6,933.

DATED: October 5, 2021

Respectfully submitted,

**FRONTIER AIRLINES, INC.**



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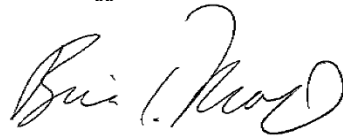
**CERTIFICATE OF SERVICE**

Pursuant to LR IC 4-1, I hereby certify that on October 5, 2021, the foregoing was served upon the following counsel of record *by email only*:

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***Attorneys for Plaintiffs***



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**VERIFICATION**

I certify under penalty of perjury that the foregoing *Defendant Frontier Airlines, Inc.'s Answers to Plaintiff A.D.'s Third Set of Interrogatories* are true and correct.

Date: 10-6-21

A handwritten signature in black ink, appearing to read 'H. Diamond', written over a horizontal line.

HOWARD DIAMOND

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

PETER DELVECCHIA, individually and as  
next friend of A.D., a Minor,

*Plaintiffs,*

v.

FRONTIER AIRLINES, INC.,  
SCOTT WARREN, and REX SHUPE

*Defendants.*

Case No.: 2:19-cv-01322-KJD-DJA

**FRONTIER AIRLINES, INC.'S  
ANSWERS TO  
PLAINTIFF PETER DELVECCHIA'S  
THIRD INTERROGATORIES**

**DEFENDANT FRONTIER AIRLINES, INC.'S  
ANSWERS TO PLAINTIFF PETER DELVECCHIA'S THIRD INTERROGATORIES**

Defendant FRONTIER AIRLINES, INC. ("Frontier") by its undersigned attorneys provides the  
following Answers to Plaintiff Peter DelVecchia's Third Interrogatories.

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1           1. Please identify by full name, current job title, current job description, and current principal  
 2 assigned job location each and every person who has accessed the **DelVecchia PNR** at any time on or after  
 3 March 28, 2019. If any such person's current job title, job description and/or principal job location is  
 4 different from their job title, job description and/or principal assigned job location at the time(s) that they  
 5 accessed the **DelVecchia PNR**, please also state what that person's job title, job description and principal  
 6 assigned job location was at the time(s) of accessing the **DelVecchia PNR**. If any such person is no longer  
 7 employed by **Frontier**, please also state the most recent address, telephone number and email address for  
 8 such person contained in **Frontier's** records.

9 **ANSWER:** Frontier objects to Plaintiff Peter DelVecchia's Third Interrogatory No. 1 because it is not  
 10 relevant to any party's claims or defenses. Subject to and without waiving such objection, Beth  
 11 Zimmerman, Customer Relations Advocate in Denver, CO.

12           2. Please state the most recent address, telephone number and email address contained in  
 13 **Frontier's** records for Matthew Anderson, who is identified as "Customer Relations Advocate" in the  
 14 **DelVecchia PNR**.

15 **ANSWER:** [.com](#)  
 16 240-

17           3. Please identify what the initials "FLB" stand for in the following sentence quoted from the  
 18 page of the **DelVecchia PNR** bearing Bates number 19AZF0229 DELVECCHIA FRONTIER 0095:  
 19 "FLB charged is as a racist incident." Please also identify by full name, current job title, current job  
 20 description, and current principal assigned job location each and every person who is known to **Frontier**  
 21 as having had any involvement in the action described in the **DelVecchia PNR** by the phrase "FLB  
 22 charged it as racist incident."

23 **ANSWER:** On information and belief, FLB is a typographical error, and it was intended to be "FBI."

24           4. Please state the current job title, current job description, and current principal assigned job  
 25 location of the persons identified in the **DelVecchia PNR** as Jason Grimes, Lawrence Carvalho, and  
 26 Angelica Paulo. If any of those named persons is no longer employed by **Frontier**, please also state the  
 27 most recent address, telephone number and email address for such person contained in **Frontier's** records.

28 **ANSWER:** Jason Grimes, Flight Attendant, Chicago, IL.

Lawrence Carvalho is not a past or present Frontier employee.

Angelica Paulo is not a past or present Frontier employee.

          5. Please state the full names, addresses, telephone numbers, email addresses and seat  
 assignments on **Flight 2067** of all persons who were assigned seats in Rows 1 through 16 of the **Aircraft**,  
 and the full names, addresses, telephone numbers, email addresses and seat(s) occupied on **Frontier 2067**

1 of all persons who moved to a seat in Rows 1 through 16 of the **Aircraft** after previously being assigned  
2 a seat in a different Row.

3 **ANSWER:** See documents produced as Frontier 705-709.

4 DATED this 25<sup>th</sup> day of June, 2021

Respectfully submitted,

5 **FRONTIER AIRLINES, INC.**

6 /s/ Brian T. Maye

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**CERTIFICATE OF SERVICE**

Pursuant to LR IC 4-1, I hereby certify that on the 25<sup>th</sup> Day of June, 2020, the foregoing **DEFENDANT FRONTIER AIRLINES, INC.'S ANSWERS TO PLAINTIFF PETER DELVECCHIA'S THIRD INTERROGATORIES** was served upon the following counsel of record *by email only*:

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